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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BERNADINE GRIFFITH; PATRICIA
SHIH; RHONDA IRVIN; MATTHEW
RAUCH; JACOB WATTERS,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

TIKTOK, INC., a corporation;
BYTEDANCE, INC., a corporation,

Defendants.

Kalpna Srinivasan (CA SBN 237460)
Steven Sklaver (CA SBN 237612)
Michael Gervais (CA SBN 330731)
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Case No. 5:23-cv-00964-SB-E

DISCOVERY MATTER

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION TO
COMPEL DISCOVERY
REGARDING THE DATA
COLLECTED ON NON-TIKTOK
USERS AND CHANGES MADE TO
THE TIKTOK SDK**

Magistrate Judge: Hon. Charles Eick
Date/Time: Dec. 8, 2023 at 9:30 AM
Place: Courtroom 750
255 East Temple St., Los Angeles, CA
90012

Discovery Cutoff Date: 5/10/24
Pretrial Conference Date: 9/13/24
Trial Date: 9/30/24

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on December 8, 2023, at 9:30 a.m., in the
3 courtroom of the Honorable Charles F. Eick, United States Magistrate Judge, located
4 at the Roybal Federal Building and United States Courthouse, 255 East Temple
5 Street, Los Angeles, CA, 90012, Courtroom 750, 7th Floor, Plaintiffs will and hereby
6 do move pursuant to Federal Rule of Civil Procedure 37 for an order compelling
7 Defendants to produce, within 7 days, documents responsive to RFP Nos. 2, 7, 8, 10,
8 11, 13, 20, 21, 25, 37, and 38, which include:

- 9 1. A sample of non-TikTok user data that Defendants collect, generate, and
10 process on a single day;
11 2. Documents—including release notes, update descriptions, product design
12 documents, and launch documents—describing the changes that Defendants
13 have made to the TikTok Pixel, the TikTok Events API, and related internal
14 software that is used to process non-TikTok user data; and
15 3. Historical Pixel settings for the websites identified in the First Amended
16 Complaint.

17 This motion is made following the conferences of counsel pursuant to L.R. 7-
18 3 and L.R. 37-1 which took place on August 24, 2023 and October 23, 2023.

19 This motion to compel is based upon this notice, the concurrently filed joint
20 stipulation, the exhibits and declarations attached thereto, the pleadings and records
21 on file in this action and such other matters as the Court deems necessary and proper.

22 Dated: November 9, 2023

By: /s/ Y. Gloria Park

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PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On November 9, 2023, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Central District of California, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 9, 2023, at New York, NY.

/s/ Y. Gloria Park
Y. Gloria Park